UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND

In Re:

Joscel Quinto : Case No. 15-12019 WIL

Chona Quinto : Chapter 13

:

Debtors :

OBJECTION TO EXEMPTIONS

Comes now, Nancy Spencer Grigsby, Chapter 13 Trustee, and objects herein to the exemptions claimed by Debtors and for reasons states:

- 1. This Chapter 13 case was filed on February 13, 2015. The meeting of creditors was held and concluded on March 26, 2015.
- 2. The Debtors' Schedule C (Dkt. 1) cites to ACM, C & JP § 11-504(f)(1)(i)(2) as the authority for the proposed exemptions of \$45,950 of Debtors' real property.
- 3. The Debtors have exceeded the allowed homestead exemption of \$22,975 by \$22,975.

WHEREFORE, for the foregoing reasons, the Trustee moves that this Honorable Court disallow the above-cited exemption claimed by the Debtors on Schedule C (Dkt.1), and for such other and further relief as to this Honorable Court may deem necessary and proper.

Date: April 2, 2015 Respectfully submitted,

Nancy Spencer Grigsby Chapter 13 Trustee

/s/ Nancy Spencer Grigsby 4201 Mitchellville Road Suite 401 Bowie, Maryland 20716 Tel. (301)805-4700

Fax 301-805-9577

E-mail: ngrigsby@ch13md.com

NOTICE PURSUANT TO LOCAL RULE 4003-1

PLEASE TAKE NOTICE THAT: (1) any opposition to the Objection must be filed with the Court and served on the Chapter 13 Trustee at the address provided above within twenty-eight (28) days after the date on the Certificate of Service; and (2) the Court may rule upon the Objection and any response thereto without a hearing.

POINTS AND AUTHORITIES

U.S. Bankruptcy Code, Section 522 (b)
Maryland Annotated Code, <u>Courts and Judicial Proceedings</u> Article, Section 11-504.
Fed. R. Bankr. Proc. 4003 and Local Rule 4003-1.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, and/or by first class mail, postage prepaid on April 2, 2015 to:

Joscel Quinto Chona Quinto 9517 Greenel Road Damascus, MD 20872

William Frederick Steinwedel, Esquire Maryland Legal Aid Bureau 500 E. Lexington Street Baltimore, MD 21216

/s/Nancy Spencer Grigsby
Nancy Spencer Grigsby